

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

FILED/ACCEPTED

AUG 26 2008

Federal Communications Commission
Office of the Secretary

In the Matter of)

HTC Communications, LLC)

Petition for Waiver of Section 54.802(a)
of the Commission's Rules)WC 08-71
Docket No. 96-45**To: Chief, Wireline Competition Bureau****PETITION FOR WAIVER – EXPEDITED ACTION REQUESTED**

Pursuant to Section 1.3 of the Commission's Rules,¹ HTC Communications, LLC ("HTC" or the "Company") hereby requests the Federal Communications Commission ("FCC" or "Commission") for a waiver of the June 30, 2008 deadline for submitting line-count data for receipt of Interstate Access Support ("IAS") as specified in Section 54.802(a) of the Commission's Rules ("the Line Count Rules").² As demonstrated herein, strict enforcement of the Line Count Rules in this specific circumstance would be improper and contrary to the public interest in that it would penalize the Company for problems created by the inefficient administrative procedures at the Universal Service Administrative Company ("USAC") that were beyond the control of the Company. Accordingly, waiver of the Line Count Rules is warranted under these circumstances to ensure that the Company receives the Universal Service support that it is entitled to as a Competitive Eligible Telecommunications Carrier ("CETC") in the state of South

¹ See 47 C.F.R. §1.3.

² See 47 C.F.R. § 54.802(a).

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Carolina to adequately meet the needs of its rural subscribers thus advancing the public interest.

1. BACKGROUND

HTC is a CETC providing service within the state of South Carolina in an area served by Verizon South, a non-rural local exchange carrier ("LEC"). Under current FCC Rules, CETCs receive high-cost support based on the per-line support received by the incumbent LEC,³ subject to a cap imposed by the FCC's recent CETC Cap Order.⁴ Verizon South receives IAS support in the areas in which HTC is designated as a CETC. HTC also qualified to receive ICLS support associated with the LEC territory for Horry Telephone (HTC's parent company). Accordingly, HTC receives the same IAS and ICLS per-line support received by the relevant LECs, subject to the cap, so long as certain line count and certification filings are made with USAC and the FCC on a timely basis.

On April 17, 2008, HTC was granted CETC designation by the South Carolina Public Service Commission ("SCPSC").⁵ The Line Count Rules require that in order for a CETC to receive IAS and ICLS support, the CETC must file line count data on a

³ See 47 C.F.R. § 54.307.

⁴ See *High-Cost Universal Service Support; Federal-State Joint Board on Universal Service; Alltel Communications, Inc. et al. Petitions for Designation as Eligible Telecommunications Carriers; RCC Minnesota, Inc. and RCC Atlantic, Inc. New Hampshire ETC Designation Amendment*, WC Docket No. 05-337, CC Docket No. 96-45, Order, FCC 08-122 (rel. May 1, 2008) ("CETC Cap Order") at para. 1.

⁵ See *Application of HTC Communications, LLC for Designation as an Eligible Telecommunications Carrier Pursuant to Section 24 (e)(2) of the Communications Act of 1934, Public Service Commission of South Carolina, Order Designating HTC Communications, LLC as an Eligible Telecommunications Carrier*, Docket No. 2007-402-C, Order No. 2008-273, (rel. April 17, 2008). A copy of this Order is attached to this Waiver Request as Attachment 1.

quarterly basis with USAC.⁶ For HTC, its first line count filing for IAS support was due on June 30, 2008, containing the line count information as of March 31, 2008, while the corresponding quarterly filing for ICLS support was due on July 31, 2008, containing line count information as of December 31, 2007. As further explained below, HTC however did not make the June 30, 2008 IAS line count filing at that time due to numerous issues with USAC that prevented HTC from receiving a Study Area Code ("SAC") and a Service Provider Identification Number ("SPIN") in a timely manner. Instead, HTC filed a Form 525 containing line count information for both IAS and ICLS support, on July 31, 2008.⁷

The reason that HTC did not file its IAS line count information on June 30, 2008, was due to problems created by USAC's inefficient administrative procedures that were beyond the control of the Company. On April 11, 2008, HTC mailed its initial request to receive a SAC and SPIN on Form 498.⁸ On April 21, 2008, USAC however rejected the Form 498 because the mailing address submitted did not match the requested format, and the general contact signature was missing.⁹ On April 28, 2008, HTC mailed a second Form 498 to USAC, which addressed the errors outlined in the April 21, 2008 rejection notification.¹⁰ On May 12, 2008, USAC and HTC exchanged a series of emails to address two problems. The first problem addressed at this time was due to the fact that

⁶ See § 47 C.F.R. 54.802(a) & 47 C.F.R. § 54.307(c). Line count data for both of these mechanisms are reported on one FCC Form 525 "Competitive Carrier Line Count Report".

⁷ A copy of the line count filing for both IAS and ICLS support was prepared and filed on July 31, 2008. A copy of this Filing is attached to this Waiver Request as Attachment 2.

⁸ A copy of HTC's initially filed Form 498 is attached to this Waiver Request as Attachment No. 3.

⁹ A copy of USAC's rejection of HTC's initially filed Form 498 is attached to this Waiver Request as Attachment No. 4.

¹⁰ A copy of HTC's second filed Form 498 is attached to this Waiver Request as Attachment No. 5.

USAC placed HTC's request for a new SPIN on hold, because their records showed that HTC already had a SPIN. HTC informed USAC that their existing SPIN was used in association with HTC's competitive local exchange carrier landline operations, and the request for a new SPIN was to be used in conjunction with HTC's wireless operations. HTC originally made USAC aware of the fact that there were two HTC affiliates eligible for USF support in April, but were compelled to provide this information to USAC again in light of the hold that had been placed on their request for a new SPIN. The second problem addressed at this time was due to the fact that HTC did not elect Schools and Libraries funding on the Form 498. However, the reason that HTC did not make such an election is because HTC does not currently qualify for Schools and Libraries funding. On May 21, 2008, HTC mailed a third Form 498 to USAC, which addressed the error regarding the Schools and Libraries program discussed in the emails exchanged earlier in May.¹¹ Consistent with directions provided by USAC Staff, HTC's third filed Form 498 contained modifications in the event that HTC would ever qualify for Schools and Libraries support in the future. On May 29, 2008, USAC rejected HTC's third filed Form 498, because the address used on the W-9 form did not match the address on the Form 498. However, the reason that the addresses did not match is because the pre-populated W-9 form lists HTC's address as its mailing address which is a post office box number.¹² Further, in light of the fact that this issue was not raised in previous rejections issued by USAC, the Company had no reason to believe that listing their street address in this

¹¹ A copy of HTC's third filed Form 498 is attached to this Waiver Request as Attachment No. 6.

¹² A copy of USAC's rejection of HTC's third filed Form 498 is attached to this Waiver Request as Attachment No. 7.

section of the form was incorrect. On June 11, 2008, HTC mailed a fourth Form 498 to USAC, which addressed the errors outlined in the May 29, 2008 rejection notification.¹³

On June 25, 2008, HTC contacted two representatives from USAC. The first USAC representative informed the Company that their fourth filed Form 498 had been accepted, and she verbally provided HTC with their new SPIN. The second USAC representative stated that she needed a copy of the Order issued by the SCPSC which granted HTC's request for CETC designation, as well as the newly assigned SPIN, before the new SAC would be issued. These documents were forwarded to USAC on that same day. However, it was not until June 30, 2008, the due date for the IAS line count filing, that USAC submitted an electronic notification to HTC which assigned the Company a new SAC. Receiving the SAC at such a late date did not allow sufficient time for the Company to make the IAS line count filing. Accordingly, the Company included the IAS line count data with its ICLS line count data filing which it submitted on July 31, 2008.

As a result of these problems created by USAC's inefficient administrative procedures, the Company has had to undergo hardship by foregoing its IAS support for an entire quarter. Consequently, the Company seeks waiver of the application of the Line Count Rules and requests that the FCC direct USAC to process the IAS line count information contained on the Form 525 which was submitted to USAC on July 31, 2008.

2. DISCUSSION

In the context of granting a waiver of the Line Count Rules, the Commission summarized its waiver standard as follows:

¹³ A copy of HTC's fourth filed Form 498 is attached to this Waiver Request as Attachment No. 8.

[g]enerally, the Commission's rules may be waived for good cause shown. The Commission may exercise its discretion to waive a rule where the particular facts make strict compliance inconsistent with the public interest. In addition, the Commission may take into account considerations of hardship, equity, or more effective implementation of overall policy on an individual basis. Waiver of the Commission's rules is therefore appropriate only if special circumstances warrant a deviation from the general rule, and such deviation will serve the public interest. Moreover, in demonstrating whether a waiver is warranted, the burden of proof rests with the petitioner.¹⁴

HTC's request for a waiver satisfies this standard.

Absent a waiver of the June Filing Deadline, application of the Line Count Rules under these special circumstances would penalize the Company for problems associated with USAC. These problems were directly related to the untimely issuance of the Company's SPIN and SAC. USAC could have rectified these problems in a more expeditious manner; nevertheless USAC's choice to handle this situation as it did was beyond the control of the Company. Moreover, the "errors" that were identified by USAC and used as the basis for rejecting the Company's second and third Form No. 498 filings, in fact were not errors at all, but changes requested by USAC staff representing their preferences for how certain information should be reported. Although HTC was happy to comply with the directions that they were given by USAC, these numerous delays ultimately created a situation that made it impossible for HTC to file line count information for IAS support before the June 30, 2008 deadline.

The FCC is well aware of the fact that there have been numerous problems surrounding the administration of the Universal Service Fund ("USF"). On July 10,

¹⁴ *Federal-State Joint Board on Universal Service; Citizens Communications and Frontier Communications Petition for Waiver of Section 54.802(a) of the Commission's Rules*, CC Docket No. 96-45, DA 05-2829, Order at para. 6 (rel. Oct. 27, 2005) citing 47 C.F.R. § 1.3; *Northeast Cellular Telephone Co. v. FCC*, 897 F.2d 1164, 1166 (D.C. Cir. 1990) (*Northeast Cellular*); *WAIT Radio v. FCC*, 418 F.2d 1153, 1159 (D.C. Cir. 1969); *Northeast Cellular*, 897 F.2d at 1166; *Tucson Radio, Inc. v. FCC*, 452 F.2d 1380, 1382 (D.C. Cir. 1971).

2008, the Government Accountability Office ("GAO") released its report entitled "The FCC Needs to Improve Performance Management and Strengthen Oversight of the High Cost Program." This report acknowledges the fact that there are serious problems with the administration and performance of USAC as the administrator of the high cost fund. Moreover, as the title of the report states, greater oversight is needed with respect to the Universal Service Fund High Cost Program. It has also been announced that the FCC intends to issue a draft Notice of Inquiry ("NOI") that is now being circulated among the Commissioners, to address the GAO report, and specifically, the problems and complaints that have been raised in conjunction with all facets of the management of the USF. The draft NOI seeks comments on ways to improve the management and administration of the Universal Service Fund. The NOI is in response to the GAO report issued last month that noted the FCC needs to do a better job of establishing short- and long-term performance goals and measures for the program, as well as identify risk areas and establish procedures to make it more cost-effective.

This situation involving HTC underscores the seriousness of the problem. Obviously, HTC had every incentive to file the Form 498 correctly the first time, and in fact the Company worked diligently with USAC Staff in order to address all concerns raised as expeditiously as possible. Nevertheless, the process for HTC to acquire a new SAC and SPIN took two months and nineteen days. Clearly this is an unacceptable time frame for obtaining the two key pieces of information necessary for a company to receive support from the USF. This lengthy time frame was due to the inefficiencies in USAC administrative procedures including the lack of directions/instructions for completing the Form 498 that makes it clear whether or not a street address or post office box address is

appropriate, failure to indicate how a company who is not currently eligible for receiving Schools and Libraries support should address that issue on the Form, and other basic instructions that would address questions that must arise in every instance where a new company is attempting to complete Form 498 in order to obtain a SAC and SPIN.

For the foregoing reasons, HTC respectfully requests that the Bureau expeditiously grant this petition and waive the application of the Line Count Rules for the Form 525 filing containing the Company's line count data for IAS which was due June 30, 2008. Further, the Company requests that the FCC direct USAC to process this line count information so that USAC can determine the amount of funds that would have been available to the Company during the third quarter of 2008, and distribute those funds to the Company.

Respectfully submitted,

HTC Communications, LLC

By: /s/ M. O'Neal Miller, Jr.

M. O'Neal Miller, Jr.
Chief Executive-Financial Operations
HTC Communications, LLC
P.O. Box 1820
Conway, South Carolina 29528-1820
843/365-2151

August 22, 2008

Attachment 1

COPY

BEFORE

THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA

DOCKET NO. 2007-402-C – ORDER NO. 2008-273

APRIL 17, 2008

IN RE: Application of HTC Communications, LLC for) ORDER DESIGNATING
Designation as an Eligible) HTC COMMUNICATIONS,
Telecommunications Carrier Pursuant to) LLC AS AN ELIGIBLE
Section 214(e)(2) of the Communications Act) TELECOMMUNICATIONS
of 1934) CARRIER

This matter is before the Public Service Commission of South Carolina ("the Commission") on the Application of HTC Communications, LLC ("HTCC") for designation as an eligible telecommunications carrier ("ETC") under 47 U.S.C. § 214(e)(2). HTCC filed its Application on November 8, 2007.

The South Carolina Office of Regulatory Staff ("ORS") was a party to this proceeding pursuant to statute. No other entities intervened or appeared in this docket. The public hearing was held at the Commission offices on February 28, 2008, with the Honorable G. O'Neal Hamilton, Chairman, presiding. At the hearing, Jeremy C. Hodges, Esquire, represented HTCC. C. Lessie Hammonds, Esquire, represented ORS.

By this Application, HTCC seeks authorization to receive support from the federal Universal Service Fund ("USF") for use within HTCC's licensed service territory in South Carolina. The Telecommunications Act of 1934 provides that "only an eligible telecommunications carrier designated under section 214(e) shall be eligible to receive

federal universal service support.¹ Pursuant to 47 U.S.C. § 214(e)(2), this Commission has jurisdiction to designate a competitive carrier as an ETC.

Requirements for Designation

The Commission may, with respect to an area served by a rural telephone company, and shall, in all other cases, designate more than one common carrier as an ETC for a designated service area, consistent with the public interest, convenience, and necessity, so long as the requesting carrier meets the requirements of § 214(e)(1).² Before designating an additional ETC for an area served by a rural telephone company, the Commission must determine that the designation is in the public interest.³

An ETC petition must contain the following: (1) a demonstration of the petitioner's capability and commitment to offer all services that are supported by the USF; (2) a demonstration of the petitioner's capability and commitment to offer the supported services "either using its own facilities or a combination of its own facilities and resale of another carrier's services;" (3) a description of how the petitioner will "advertise the availability of the [supported services] and the charges therefore using media of general distribution;" and (4) a detailed description of the geographic area for which it requires an ETC designation from the Commission.⁴

¹ 47 U.S.C. § 254(e).

² 47 U.S.C. § 214(e)(2).

³ *Id.*

⁴ 47 U.S.C. § 214(e)(1); 47 C.F.R. § 54.201.

DISCUSSION

HTCC's Capability and Commitment to Offer All Services Supported By the USF

HTCC has demonstrated through its Application and related submissions to the Commission that it now offers, or will offer upon designation as an ETC, all of the services supported by the USF. As noted in its petition and in the direct, pre-filed testimony of Mr. Larry Spainhour, HTCC currently provides, or is committed to providing, all of the services and functionalities required by the Federal Communications Commission ("FCC")⁵ throughout its designated service area in South Carolina. As set forth in the Settlement Agreement with ORS, HTCC is also committed to making the federal Lifeline and Link-Up programs available to qualifying low-income consumers in accordance with the Commission's proposed regulation 103.690.1. Through this commitment, HTCC will advertise the availability of and initiate outreach programs to promote the availability of Lifeline and Link-Up programs within its designated service area.

HTCC has also committed to comply with FCC rules that have been adopted by this Commission governing ETC designations.⁶ These commitments include: (1) adherence to the CTIA Consumer Code for Wireless Service; (2) annual reporting of unfulfilled service requests and complaints per 1,000 handsets; (3) demonstration of ability to remain functional in emergencies and annual reporting of network outages; (4) specific commitments to provide service to requesting customers in its designated service

⁵ See 47 C.F.R. § 54.101; HTCC Application at pp. 7 - 10

⁶ See 47 C.F.R. § 54.202, 54.209; See also Commission Order 2007-424.

area; and (5) specific commitments to improve its existing network with the use of high-cost support.

HTCC has also committed to develop and offer a wireless service plan that includes unlimited local calling in a manner and price that is the same as what is offered by the incumbent LEC in its designated service area.⁷

Offering the Supported Services Using HTCC's Own Facilities

HTC applicants are required to demonstrate that they offer the supported services using either their own facilities or a combination of their own facilities and resale of another carrier's services.⁸ HTCC has demonstrated that it satisfies this requirement.⁹

HTCC has also committed to offering its services to customers making reasonable requests for such in accordance with the process set forth by the FCC and the proposed regulations of this Commission.¹⁰

Advertisement of the Availability of the Supported Services

HTCC has committed to advertise the availability of the services supported by the federal USF and their applicable charges using media of general distribution within its designated service territory.¹¹ These advertisements will be made in the same manner as the incumbent local exchange carriers and designed to disclose to all potential customers the services available to them, and the applicable charges for those services, including Lifeline and Link-Up programs for qualifying low-income individuals.

⁷ See Settlement Agreement between ORS and HTCC, dated Feb. 15, 2008.

⁸ 47 U.S.C. § 214(e)(1)(A).

⁹ Affidavit of Curley P. Huggins, p. 2, ¶ 11, at exhibit A to HTCC Application; See also Transcript at p 30:14-31:10.

¹⁰ See 47 C.F.R. § 54.202(a)(1)(a); See also proposed R.103.690(a)(1)(A)(2); HTCC Application, pp. 3-4.

¹¹ HTCC Application, p. 11; See 47 U.S.C. § 214(e)(1)(B).

Public Interest Analysis

In evaluating HTCC's Application, the Commission must determine whether the requested designation is in the public interest.¹² The ETC applicant bears the burden of establishing that the public interest is served by its requested designation.¹³ In areas served by a non-rural telephone company, the Commission is required to designate an additional ETC that meets the applicable requirements of that designation, consistent with the public interest, convenience, and necessity.¹⁴ We conclude that it is in the public interest to designate HTCC as an ETC for the portions of its requested service area that are served by the non-rural telephone company, Verizon South, as listed in the Revised Exhibit B to HTCC's Application.

In areas served by a rural telephone company, the Commission must determine whether the public interest would be served by granting the requested designation.¹⁵ An analysis of the public interest requires consideration of the benefits of increased consumer choice and the unique advantages and disadvantages of the applicant's service offering.¹⁶ When an ETC applicant seeks designation below the study area of (i.e., in less than the full study area of) a rural telephone company, a creamskimming analysis is required to compare the population densities of the wire centers where the applicant seeks designation with the population densities of the wire centers located in the portions of the study area where the applicant does not seek designation.¹⁷

¹² 47 U.S.C. § 214(e)(2).

¹³ See *ETC Report and Order*, 20 FCC Rcd. At 6392-95, paras. 48-53.

¹⁴ 47 U.S.C. § 214(e)(2).

¹⁵ *Id.*

¹⁶ See 47 C.F.R. § 54.202(c); *ETC Report and Order*, 20 FCC Rcd. At 6392-95, paras. 48-53.

¹⁷ See *Id.*

HTCC's Application does not implicate any creamskimming concerns. HTCC has requested designation in the entire study area of its affiliate rural telephone company, Horry Telephone Cooperative.¹⁸ Further, we conclude that HTCC has satisfied the burden of proof in establishing that its universal service offering in the requested areas will provide benefits to rural and non-rural customers, and that therefore, it is consistent with the public interest, convenience, and necessity to designate HTCC as an ETC in these requested service areas.

We find that HTCC's universal service offering will provide a variety of benefits to customers in its service area, including increased customer choice and new service offerings. Additionally, designation will enable HTCC to construct new facilities to improve quality of service and extend service to users in underserved and un-served rural areas. HTCC's two year plan reveals that HTCC will construct facilities in the vicinity of communities whose per capita income are well below the state average. Designation will also promote increased competition among wireline and wireless carriers that will create additional incentives for providers to increase their operating efficiency and introduce new service offerings, increased quality and value to their customers.¹⁹

HTCC has demonstrated that there are areas of its service territory where its existing network provides limited or no coverage at all, even when currently planned additions to its network are taken into account. We find that HTCC's network improvement plan includes the addition of numerous new cell sites that will significantly

¹⁸ HTCC Application, pp. 11 – 12.

¹⁹ HTCC Application, p. 12.

improve and expand the existing coverage of its network, particularly in rural areas of its service territory.²⁰

We accept HTCC's commitment to use all available support as required by applicable law and regulations. We also find that HTCC's initial two-year network improvement plan is sufficient to support a grant of this petition. We note that HTCC has also agreed not to utilize any universal service funds for the provision of broadband type services.²¹ We also accept the unopposed testimony that HTCC will invest all of the support it receives on eligible projects as required by the Commission.²²

We find that HTCC's designation will promote affordable telephone service with the calling plan it will develop and offer that includes local calling in a manner and price that is the same as the incumbent LEC in the service area where it requests designation.²³ HTCC has also made detailed commitments to provide high-quality service throughout the proposed area in which it seeks designation.²⁴ Given HTCC's commitment to comply with the CTIA Consumer Code for Wireless Service, and its commitment to comply with the rules and regulations of the FCC and this Commission, we find that HTCC has made commitments to service quality that will benefit the public in HTCC's proposed service area and assist the Commission in evaluating that service quality on a continuing basis. Because we have the ability to review HTCC's performance each year, we will be able to ensure that South Carolina's rural citizens realize the benefits that HTCC has promised and that Congress intended to deliver when it authorized competitive carriers.

²⁰ Tr. at p.48:24-49:6.

²¹ See Settlement Agreement, at ¶ 7.

²² Tr. at p.48:11-23.

²³ See Settlement Agreement at ¶ 8.

²⁴ See generally, HTCC Application.

As set forth herein, we find that the designation as an ETC in the rural study area of Horry Telephone Cooperative and the non-rural study area of Verizon South within HTCC's licensed service area, identified in HTCC's Application, is in the public interest. Specific wire center codes for these study areas were provided to the Commission and are found at Revised Exhibit B to HTCC's Application.

Because HTCC requests ETC status in the entire study area of the rural telephone company, Horry Telephone Cooperative, we are not concerned about the potential for creamskimming.²⁵

IT IS, THEREFORE, ORDERED THAT:

1. HTCC is designated as an ETC, as of the effective date of this Order, in the requested areas served by the non-rural telephone company, Verizon South, Inc., as listed in Revised Exhibit B to HTCC's Application.
2. HTCC is designated as an ETC, as of the effective date of this Order, in the entire study area served by the rural telephone company, Horry Telephone Cooperative, as listed in Revised Exhibit B to HTCC's Application.
3. HTCC shall abide by the FCC's ETC designation rules set forth at 47 C.F.R. § 54.202 and 209, consistent with Commission Order No. 2007-424.
4. HTCC shall abide by its commitment to provide service through its ETC designated service area to all customers making a reasonable request for service, including low-income customers.

²⁵ *ETC Report and Order*, 20 FCC Rcd. at 6392, -95, para. 49 ("When a competitive carrier requests ETC designation for an entire rural service area, it does not create creamskimming concerns because the affected ETC is required to serve all wire centers in the designated service area.")


5 All federal USF funding received as a result of this Order will be used to support the expansion and improvement of services throughout HTCC's service territory and provide Lifeline and Link-Up credits for low income customers as required by the FCC and this Commission.

6 Upon filing this Order, the Commission will file a certification with the FCC and the Universal Service Administrative Company "within 60 days of the effective date" of this Order, as required by 47 C.F.R. § 54.313 and 314, stating that HTCC will use high-cost support "only for the provision, maintenance, and upgrading of facilities and services for which the support is intend."

7. Should the Commission determine that HTCC has not honored its commitments and plans as set forth before the Commission, or has failed to follow the applicable statutes, rules, or regulations, the Commission may deny HTCC's annual recertification as an ETC.

8. This Order shall remain in full force and effect until further Order of the Commission.

BY ORDER OF THE COMMISSION:


G. O'Neal Hamilton, Chairman

ATTEST:


C. Robert Moseley, Vice Chairman

(SEAL.)

Attachment 2

COPY

FCC Form 525
High Cost Support Mechanism
Competitive Carrier Line Count Report

FCC Form 525
OMB Control No. 3060-0986
January 2005

COMPETITIVE CARRIERS HIGH COST DATA SUBMISSION

(1) Quarterly Submission Date:	07/31/2008
(2) USAC Service Provider Identification Number (SPIN):	143032610
(3) Company Study Area Code: (First time filers leave blank and a Study Area Code will be assigned)	249004
(4) Study Area Name:	HTC Communications, LLC
(5) Company Legal Name:	HTC Communications, LLC
(6) Filer 499 ID:	806994

Do not write in this Area:
For Administrator's Use Only

Submitted ONLINE
07/31/2008 15:47:54

Check Box if this is a new address/contact from a previous data submission:

(7) Mailing Address:	3480 Hwy. 701 N., P.O. Box 1820, Conway, SC 29528-1820		
(8) Contact Name:	Joni Jordan	(9) Title:	Accountant
(10) Telephone Number:	8433698138		
(11) E-mail Address:	joni.jordan@htcinc.net		

(12) Mechanism for which you are requesting support:	(13) Lines Reported as of:	(14) Type of Filing		(15) Worksheet to Complete
		Original	Revision	
High Cost Loop Support (HCL)	Dec 31, 2007			Complete HCL and LSS
Local Switching Support (LSS)	Dec 31, 2007			Complete HCL and LSS
Interstate Common Line Support (ICLS)	Dec 31, 2007	✓		Complete ICLS Worksheet
High Cost Model Support (HCM)	Dec 31, 2007			Complete HCM Worksheet
Interstate Access Support (IAS)	Mar 31, 2008	✓		Complete IAS Worksheet

FCC Form 525
OMB Control No. 3060-0986
January 2005

[illegible]

[illegible]

FCC Form 525
OMB Control No. 3060-0986
January 2005

[illegible]

FCC Form 525
OMB Control No. 3060-0986
January 2005

Do not write in this Area:
For Administrator's Use Only

IAS Line Count Worksheet - submitted ONLINE 07/31/2008 15:47:54

UNBUNDLED NETWORK ELEMENTS REPORTING

(2) USAC Service Provider Identification Number (SPIN):	143032610	Do not write in this Area: For Administrator's Use Only
(3) Company Study Area Code:	249004	
(4) Study Area Name:	HTC Communications, LLC	

Complete one worksheet for each study area of a Path 1 rural incumbent carrier in which the competitive carrier is reporting lines and uses unbundled network elements ("UNEs") to serve the reported lines. The competitive carrier must separately identify the number of UNE loops; UNE price per loop; any port and vertical services costs included in the UNE loop price; number of loops receiving UNE switching service; the UNE switching price per minute and number of switching minutes.

(51) Incumbent Carrier Name:	
(52) Incumbent Carrier Study Area Code:	

Please provide the following information for Path 1 Rural Incumbent Carrier Study Area:

(53) UNE Zone	Loops w/o Port Cost		Loops w/Ports		Vertical Services		Switching	
	(54) No. of Loops	(55) Price per loop	(56) No. of ports	(57) Price/port	(58) No. of loops w/Vertical Services	(59) Price for vertical services on each loop	(60) No. of loops with switching	(61) No. of switching minutes
Zone 1								
Zone 2								
Zone 3								
Zone 4								
Zone 5								

Complete one worksheet for each study area for a Path 2 or Path 3 rural incumbent carrier in which the competitive carrier is reporting lines and uses unbundled network elements ("UNEs") to serve the reported lines. For each incumbent study area, list the name of each disaggregation zone. If disaggregation zone includes more than one UNE zone, please report the lines in each UNE zone per aggregation zone on a separate row. The competitive carrier must separately identify the number of UNE loops; UNE price per loop; any port and vertical services costs included in the UNE loop price; number of loops receiving UNE switching service; the UNE switching price per minute and number of switching minutes.

Please provide the following information for Path 2 and Path 3 rural incumbent carrier study areas:

(63) UNE Zone Name	(64) Disaggregation Zone Name	(65) UNE type	(66) Quantity	(67) Price	(68) Minutes
		Loops without port costs			
		Ports			
		No. of loops w/Vertical Services			
		No. of loops w/switching			
		Loops without port costs			
		Ports			
		No. of loops w/Vertical Services			
		No. of loops w/switching			
		Loops without port costs			
		Ports			
		No. of loops w/Vertical Services			
		No. of loops w/switching			
		Loops without port costs			
		Ports			
		No. of loops w/Vertical Services			
		No. of loops w/switching			